

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

BIENVENIDO FRANCO, Individually and on )  
Behalf of All Others Similarly Situated, )

Plaintiffs, )

v. )

IDEAL MORTGAGE BANKERS, LTD. d/b/a )  
LEND AMERICA, INC., MICHAEL ASHLEY, )  
TIMOTHY MAYETTE, HELENE DECILLIS, )  
MICHAEL PRIMEAU, )

Defendants. )

Civ. No.: 07 CV 3956  
(JS/AKT)

**PLAINTIFFS' MOTION IN LIMINE NO. 6**

Plaintiffs respectfully move this Honorable Court to exclude the following evidence:

Any evidence that Defendants' pay practices conform with industry customs or standards. Such evidence is patently irrelevant and inadmissible for any purpose. Fed. R. Evid. 401-402; *Alvarado v. Corporate Cleaning Service, Inc.*, 2011 WL 2135057, at \*2-3 (N.D. Ill. May 27, 2011).

Dated: July 15, 2013

Respectfully Submitted,

/s/ James B. Zouras

James B. Zouras  
Ryan F. Stephan  
(Admitted Pro Hac Vice)  
STEPHAN ZOURAS, LLP  
205 North Michigan Avenue  
Suite 2560  
Chicago, IL 60601  
(312) 233-1550  
(312) 233-1560 (Fax)

Erik H. Langeland  
ERIK H. LANGELAND, P.C.  
500 Fifth Avenue, Suite 1610  
New York, NY 10110  
Phone: (212) 354-6270  
Fax: (212) 898-9086  
[elangeland@langelandlaw.com](mailto:elangeland@langelandlaw.com)

**COUNSEL FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **PLAINTIFFS' MOTION IN LIMINE NO. 6** was served upon the following parties via this Court's ECF filing system, this 15<sup>th</sup> day of July, 2013:

Robert H. Weiss  
26S Stonywell Court  
Dix Hills, New York 11746  
[Roberthw119@msn.com](mailto:Roberthw119@msn.com)

Erik H. Langeland  
Erik H. Langeland, P.C.  
500 Fifth Avenue, Suite 1610  
New York, New York 10110  
[Elangeland@langelandlaw.com](mailto:Elangeland@langelandlaw.com)

And, electronically mailed the above mentioned on this 15<sup>th</sup> day of July, 2013 to the following address:

Helene DeCillis  
[hdecillis@gmail.com](mailto:hdecillis@gmail.com)

*/s/ James B. Zouras*  
James B. Zouras